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Attorneys for Defendants

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

ERNEST BOCK, L.L.C.,

CASE NO.: 2:19-cv-01065-JAD-EJY

Plaintiff,

vs.

PAUL STEELMAN, individually; PAUL STEELMAN, as trustee of the Steelman Asset Protection Trust; MARYANN STEELMAN, individually; MARYANN STEELMAN, as trustee of the Steelman Asset Protection Trust; STEPHEN STEELMAN; SUZANNE STEELMAN TAYLOR; JOHN DOE 1 AS TRUSTEE OF PAUL C. STEELMAN AND MARYANN T. STEELMAN REVOCABLE LIVING TRUST; JOHN DOE 2 AS TRUSTEE OF STEPHEN P. STEELMAN IRREVOCABLE TRUST; JOHN DOE 3 AS TRUSTEE OF SUZANNE T. STEELMAN IRREVOCABLE TRUST; JOHN DOE 4 AS TRUSTEE OF THE STEELMAN ASSET PROTECTION TRUST; JOHN DOE 5-14 AS TRUSTEES OF THE ABC TRUSTS 1-10; JOHN DOES 15-24; and ABC COMPANIES 1-10, jointly, severally, and in the alternative,

Defendants.

STIPULATION AND ~~PROPOSED~~
ORDER REQUESTING A TELEPHONIC
CONFERENCE WITH THE COURT
PURSUANT TO LOCAL RULE 1-1(B) TO
RESOLVE OUTSTANDING
DISCOVERY DISPUTE

///

1 Plaintiff, ERNEST BOCK, L.L.C. (“Plaintiff”), and Defendants PAUL STEELMAN,
2 PAUL STEELMAN, as trustee of the Steelman Asset Protection Trust; MARYANN
3 STEELMAN, MARYANN STEELMAN, as trustee of the Steelman Asset Protection Trust,
4 STEPHEN STEELMAN, and SUZANNE STEELMAN TAYLOR (collectively “Defendants,”
5 and together with Plaintiff, the “Parties,” and each a “Party”), by and through their counsel of
6 record, hereby stipulate, contingent upon this Court’s approval, as follows:

7 1. In anticipation of producing certain documents and information during discovery
8 in the above action (the “Action”) that should be kept confidential, within the meaning of FED. R.
9 CIV. P. 26(c), to protect the legitimate business interests of the Parties and the legitimate business
10 interests of third parties from whom discovery will be sought, the Parties have worked together to
11 agree upon the terms of the attached Stipulated Protective Order Regarding Confidential
12 Information And Inadvertent Disclosure (“Protective Order”). *See* Exhibit A.

13 2. Despite the Parties’ good faith efforts, one outstanding dispute remains that
14 requires the intervention of the Court.

15 3. The Parties have agreed to permitted uses of discovery material produced in the
16 Action that is designated as “CONFIDENTIAL” or “HIGHLY CONFIDENTIAL” under the
17 Protective Order. Plaintiff believes that those permitted uses should include the Party’s ability to
18 file and use designated discovery material in other litigations and collections matters between and
19 amongst the Parties that are currently ongoing or commence at any point as long as the Party
20 filing and using the designated discovery material does so in a manner permitted under this
21 Protective Order.

22 4. Conversely, Defendants’ position is that the Protective Order governs the production
23 and use of material designated as “CONFIDENTIAL” and “HIGHLY CONFIDENTIAL” in this
24 Action, and that the Parties shall not use or disclose such designated material outside of this
25 Action in other matters over which this Court does not have jurisdiction without prior consent
26 from the designating Party or this Court.

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28 ///

5. Because the Parties have been unable to resolve this dispute, by way of this Stipulation, the Parties hereby request that the Court schedule a telephonic conference with the Parties.

6. To allow the Court to review the Parties' competing positions, the Parties have included bracketed and highlighted language within the Protective Order in the areas where a dispute remains. *See* Exhibit A. That bracketed and highlighted language reflects how the Protective Order would read if Plaintiff's position is accepted, whereas the plan text without the bracketed and highlighted language reflects how the Protective Order would read if Defendants' position is accepted. *See* Exhibit A.

IT IS HEREBY STIPULATED AND AGREED by and among the Parties, through their undersigned counsel, that a telephonic hearing pursuant to Local Rule IA 1-1(b) is necessary to resolve the outstanding dispute between the Parties and hereby request the same.

DATED: March 27, 2020.

WEINBERG, WHEELER, HUDGINS, GUNN
& DIAL, LLC

BY: /s/ Evan M. Labov

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DATED: March 27, 2020.

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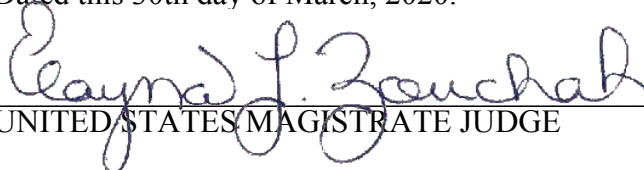
ORDER

IT IS HEREBY ORDERED, ADJUDGED, AND DECREED that the foregoing Stipulation is GRANTED.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that a telephonic conference regarding the above referenced discovery dispute shall be conducted on **April 9, 2020, at 1:30 p.m.** All Parties are instructed to call the Audio Conference Line at **(888) 251-2909, access code 7771745**, five (5) minutes prior to the hearing time. Please remain on the line until such time as the Court joins the call and convenes the proceedings. The use of a cell phone or speaker phone during the call is prohibited. The call must be made using a land line.

IT IS SO ORDERED:

Dated this 30th day of March, 2020.


UNITED STATES MAGISTRATE JUDGE

Respectfully submitted by:

BROWNSTEIN HYATT FARBER SCHRECK, LLP

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